IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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) Civil Action No. 1:24-cv-01340-JKB
))) JURY TRIAL DEMANDED)
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PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT WULING DISTRICT XINDA BALLOON BUSINESS DEPARTMENT (LEDOU BALLOON XINDA)

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Jet Creations, Inc. ("Plaintiff" or "Jet

Creations") requests that the Clerk enter default with respect to the Defendant Wuling District Xinda Balloon Business Department (Ledou Balloon Xinda) ("Defendant") As grounds for this request Jet Creations states as follows:

- 1. Jet Creations filed its complaint on May 8, 2024 (DCK1)
- 2. A summons was issued and, as the Court's docket reflects, the Defendant was duly served with process on 10/18/2024 (DCK 35).
- 3. An answer or responsive pleading was due from Defendant on or before 12/18/2024 or within 60 days from the service date.
- 4. Defendant has failed to tender an answer or otherwise plead in this cause within the time required.
 - 5. Plaintiff seeks to have default entered against Defendant.

Wherefore, since more than 60 days have elapsed since the service of the summons and Complaint and no responsive pleadings have been filed, entry of default is appropriate.

April 16, 2025

Respectfully Submitted,

/s/ Andrew C. Aitken Andrew C. Aitken, Esq (# 06413) 6701 Democracy Blvd., Suite 555 Bethesda, Maryland 20817 (301) 537-3299 acaitken@aitkenlawoffices.com

/s/ Justin King Justin King, Esq. (Bar No. 31390) WPAT, PC 8230 Boone Blvd., Suite 405 Vienna, VA 22182 (703) 639-0151 jking@wpat.com Attorneys for Jet Creations, Inc.

CERTIFICATE OF SERVICE

I hereby certify that copy of the Plaintiff's Request for Entry of Default was sent via USPS Priority Mail Express along with tracking number EY471683683US to the Defendant Wuling District Xinda Balloon Business Department at Address: Room 105, Building 6, Deyuan Community, Sanlvang Community, Yong'an Street, Wuling District, Changde City, Hunan Province, China on April 25, 2025.

April 28, 2025

/s/ Justin King Justin King, Esq. (# 31390) WPAT, PC. 8230 Boone Blvd., Suite 405 Vienna, VA 22182 jking@wpat.com